

EXHIBIT I

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

NINGBO YONGJIA AIDUO

AUTO PARTS MANU CO., LTD.,

Plaintiff,

v.

THE INDIVIDUALS, PARTNERSHIPS
AND UNINCORPORATED
ASSOCIATIONS IDENTIFIED ON
SCHEDULE "A", including

WAXMAN SALES, LLC, a Texas limited
liability company,

Defendants.

Case No.: 1:22-cv-24270-DPG

**DECLARATION OF HENRY M. POGORZELSKI IN SUPPORT OF WAXMAN
MOTION FOR AWARD OF ATTORNEYS FEES AND DAMAGES BY DEFENDANT
WAXMAN SALES LLC dba BIRDROCK HOME**

I, Henry M. Pogorzelski, state as follows:

I am an attorney at the law firm of K&L Gates LLP and am one of the attorneys representing Defendant Waxman Sales, LLC in the above captioned action. I have personal knowledge of the facts set forth in this declaration. If called upon to testify under oath, I could and would testify competently to the facts stated herein.

1. Attached as **Exhibit A** is a true and correct copy of Birdrock Home Amazon.com listing;

2. Attached as **Exhibit B** is a true and correct copy of U.S. Design Patent No. D957,138;

3. Attached as **Exhibit C** is a true and correct copy of Pogorzelski letter to Rubio dated February 5, 2023;

4. Attached as **Exhibit D** is a true and correct copy of Birdrock Brands website;

5. Attached as Exhibit F is a true and correct copy of the Amazon.com site selling the Snow MOOver.

Executed March 8, 2023 in Austin, Texas.

/s/ Henry M. Pogorzelski
Henry M. Pogorzelski